ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time:

March 15, 2004

Site Contact(s):

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Regulatory Contact: Edd Kray

Phone:

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Agency:

CDPHE

Purpose of Contact: Survey Units 22 and 25 Disposition

Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Survey units 22 and 25 for demolition. Survey Unit 22 consists of rooms 481, 482, 483, 483A, and 483B. Survey unit 25 consists of rooms 465, 477, 478, and 479.

The preparation process for Survey units 22 and 25 was initiated December 2, 2003 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the results were discussed at the weekly 776/777 survey status meeting, and the decision was made to complete the following:

- Remove contaminated ductwork from ceiling in Room 465
- Remove contaminated electrical panels from Room 465

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey units 22 and 25. The following summarizes the non-radiological activities:

Room 483 was a container storage area that was part of RCRA Unit 777.1. Building 776/777 personnel washed and rinsed floors in Building 777 Room 483. On February 4, 2004, Mr. Hindman concurred that the area in question have been closed, contingent on final disposition of the building by removal, as is required in

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the approved Demolition Plan for the facility. The waste will be managed as non-hazardous low-level debris for disposal.

- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Room 483A was listed on the historical list of rooms for storage of beryllium parts. Room 465 was also listed on the historical list of rooms for storage of beryllium parts and non-destructive testing. The KH baseline characterization of 1999 indicated no removable beryllium contamination in these survey units. Since the baseline survey, the rooms have been stripped of all equipment. The final beryllium surveys for this area was collected on horizontal surfaces from floor to ceiling, and all samples were below the reporting limit of 0.1 ug/100 cm².
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction, which would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey units 22 and 25 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey units 22 and 25 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included as an appendix to the characterization report for Survey units 22 and 25.

Contact Record Prepared By: Dyan Foss		
Required Distribution:		Additional Distribution:
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